

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

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**EON INTERNATIONAL CORPORATION,**

**Plaintiff,**  
**v.**

**Civil Case No.: 19-CV-764**

**DECLARATION**

**SAFECOMM PRODUCTS, LLC,**  
**Defendant.**

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Douglas DiFilippo, declares, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a licensed process server and principal at Douglas DiFilippo PS, PI.
2. I was hired by Hagerty & Brady to serve a motion for default judgment on the defendant Safecomm Products, LLC ("Safecomm"), in this matter.
3. I incorporate by reference the affidavits of service I executed on September 4, 2020 (Dkt. # 16, 17), and offer the Court this additional information regarding service of process on Safecomm.
4. On September 1, 2020, I first attempted to serve Safecomm at its last known business address, 3221 Southwestern Boulevard, Suite 290, Orchard Park, NY.

5. However, that address turned out to be merely a UPS Box. As a result, I decided to attempt personal service on the principal of Safecomm.

6. Based on communications from attorney Daniel Brady and my own research, I knew Albert “Sonny” Hawkins to be a key employee and/or owner of defendant Safecomm. As a result, I attempted to serve Mr. Hawkins at his business, Tiger Performance, located at 525 Bullis Rd, West Seneca, NY 14224.

7. Upon entering Tiger Performance, I saw employees working on what appeared to be flight helmets audio equipment.

8. I told the employees that I was looking for Sonny Hawkins and/or Safecomm, and one of them responded something to the effect of “yeah, what do you need?”

9. However, when I stated that I was attempting to serve legal process, the employee responded that it was “above [his] pay grade” and he went to the back of the building.

10. At that point, a woman, whom I recognized from social media posts as the spouse of Mr. Hawkins, Kathryn Blizniak, came into the main area of the store.

11. Ms. Blizniak was immediately confrontational and told me, that she had “never heard of Safecomm” and did not know Mr. Hawkins. She

asked me to leave the property. I left the Tiger Performance property at Ms. Blizniak's direction.

12. Upon leaving, I took note of the vehicles that were in the parking lot.

13. I then verified Mr. Hawkins' and Ms. Blizniak's home address from public sources, and that evening I went to their home to once again attempt service on Safecomm.

14. Upon arriving at their home, I observed Mr. Hawkins, whom I recognized from various social media and internet posts, working in his garage where there were several high end vehicles. I also observed Ms. Blizniak on the back patio of the home.

15. I also noted that one of the vehicles that was in the parking lot of Tiger Performance earlier that day was parked in the driveway.

16. Mr. Hawkins saw me approaching the home and left the garage to go inside the home. He then went to the back of the home, where I could hear him have a loud discussion with Ms. Blizniak.

17. As I went to the front door, I overheard Ms. Blizniak and Mr. Hawkins arguing about who would go to the door.

18. Ultimately, Ms. Blizniak came around to the front of the house, and I informed her again that I was effecting service on Safecomm.

19. She was even more hostile and belligerent on this occasion, and she told me she would throw the papers in the garbage. She then told me to “get a real job” and told me to get off her property. I observed her pick up the papers and throw them into the trash, and I left the property.

20. On September 3, 2020 (after two previous attempts), I made personal service upon Norman Bennett, Safecomm’s Registered Agent for service of process.

21. I declare under the penalty of perjury that the foregoing is true and correct.

DATED: November 17, 2020  
Buffalo, NY



  
Douglas DiFilippo